

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO**

**IN RE:**

**SEBASTIAN NEGRON TORRES**

**DEBTOR**

**CASE NO: 22-01893-ESL**

**CHAPTER: 13**

**MOTION REQUESTING EXTENSION OF TIME TO REPLY TO CREDITOR'S  
REQUEST FOR ENTRY OF ORDER FOR DELIVERY OF DOCUMENTS**

**TO THE HONORABLE COURT:**

**COMES NOW**, DEBTOR, through the undersigned attorney and respectfully, **STATES**,  
**ALLEGES AND PRAYS:**

1. Creditor filed a motion requesting delivery of documents such as income of the last 6 months prior the bankruptcy of Debtor and his wife, bank statements, tax returns and any other documents used for the preparation for the bankruptcy case.
2. Debtor opposes Creditor's request and is requesting 30 days to reply to Creditor's request.
3. Debtor is requesting an extension of 30 days because the Undersigned will be out of Puerto Rico.
4. Debtor informs that the local tax return for the tax year 2021 has been delivered to the Creditor in compliance with the Bankruptcy code.

**WHEREFORE**, it is respectfully requested from this Honorable Court to grant the Debtor 30 days to reply to Creditor's entry of order of delivery of documents.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY:** that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF Filing System which sends notification of such filing to all those who in this case have registered for received for of notice by electronic mail. I further certify that the foregoing has been served to U.S. Trustee at [ustpreregion21.hrecf@usdoj.gov](mailto:ustpreregion21.hrecf@usdoj.gov) and by depositing true and correct copies thereof in the United States Mail, postage prepaid, to the non ECF/CM participants: Debtor(s) and parties in interest that have filed notices of appearance, included in the service list attached to the original here.

Sebastian Negrón Torres  
Case No.: 22-01893-ESL  
Extension of time to reply to Creditor's request

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico, this 29<sup>th</sup> day of August 2022.

**/S/Víctor C. Thomas Santiago**  
***USDC PR 209807***  
**Thomas & Magriñá Law Offices**  
127 De Diego Avenue,  
Cond. Vallecillo Apt. 1-A  
San Juan, Puerto Rico 00911  
Tel. (787) 722-5601  
E-mail: ***ythomas@thomasmag.com***